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Before  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20544

MAY 24 1993

FCC-101/LRC

In the matter of

Replacement of Part 90 by )  
Part 88 to Revise the Private ) PR Docket 92-235  
Land Mobile Radio Services and )  
Modify the Policies Governing )  
Them )

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MAY 24 1993

To: The Commission

COMMENTS OF  
COUNTY OF KERN  
INFORMATION SYSTEMS DEPARTMENT  
COMMUNICATIONS DIVISION

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

INTRODUCTION

The Communications Division is a part of the Kern County Information Systems Department and is responsible for the supervision and control over the acquisition and utilization of all telecommunications resources and facilities in the Kern County government.

Kern County is located in the south central portion of California. It has an area of 8,064 square miles and a population of 584,086 (as of July 1992). Two-way radio and microwave communication plays a major role in the county government telecommunications; radio is the principal medium for the public safety, health and welfare for the citizens and their public employees.

COMMENTS

The Communications Division has carefully reviewed the proposals in this Docket and has many concerns regarding the effect the proposed rule changes would have on the communications systems of Kern County.

In common with most governmental agencies the County of Kern suffers from a shortage of channels necessary to provide the desired level of service.

The intent to reform the spectrum is timely, but the proposal as

#### NEGATIVE ASPECTS OF THIS PROPOSAL:

1. Reducing deviation to 3 kHz would result in loss of range and degrade system operation.
2. Imposition of unrealistic power limitations will result in the requirement for additional base stations to provide adequate coverage. Kern County covers 8,064 square miles with valley in the west, desert in the east, and the Sierra Nevada mountain range in the middle. Radio coverage for such a broad area REQUIRES the use of high level sites.
3. Special recognition is not given to the unique requirements of public safety and their responsibility for protecting life and property.
4. Reduction of channel bandwidth to 5 kHz in the 150-160 MHz bands. There is no equipment on the market that has been proven effective at these bandwidths.
5. Proposed channel arrangements and limitations would destroy existing mobile relay operation in the 150-160 MHz band.
6. The proposed method of dividing channels in all bands is non-standard and would cause great hardship. It would make all existing equipment obsolete and make migration to new equipment very difficult if not impossible.
7. Failure to provide dedicated channels for mutual aid purposes would eliminate existing plans and systems.
8. Proposed elimination of service block assignments without a clear plan for management would result in confusion and mismanagement.
9. Inserting other services into channels presently allocated to public safety.

#### RECOMMENDATIONS

1. Power limitations should be based on the power necessary to provide adequate signals to the agencies area of political responsibility.
2. Modulation should not be reduced below 4 kHz.
3. There must be no reduction in the amount of spectrum presently allocated to public safety and additional spectrum should be granted.
4. A frequency plan for mobile relay operation must be developed for the 150-160 MHz band.

5. Any proposed narrowing of channels should consider the best migration plan. Retention of existing center frequencies in all bands is highly desirable.
6. Time tables for conversion to new channels and new equipment must be long enough to allow amortization of existing equipment.
7. Bandwidths should not be reduced beyond the point agreed to as feasible by all manufacturers and users.
8. Service block allocations for public safety must remain unless a methodology for representative coordination is developed that is satisfactory to all public safety services.

#### CONCLUSION

The Kern County Communications Division recognizes the need to reform the spectrum and the advances in technology which make this a feasible approach. However, extreme attention must be given to avoid undue financial hardship on public safety agencies. Rules which would reduce the capability of any agencies radio system to provide the necessary coverage should not be adopted.

Respectfully submitted.

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